



HON. SYLVIA O. HINDS-RADIX
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LAW
DEPARTMENT
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December 26, 2023

VIA ECF

Hon. Stewart D. Aaron
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *M.H. v. N.Y.C. Dep't of Education*, 23-cv-6714 (DEH)(SDA)

Dear Magistrate Judge Aaron:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, the Honorable Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.*, as well as for this action.

I write to respectfully request that the Court adjourn by 6 weeks the upcoming briefing schedule set forth in ECF No. 18 to allow the parties additional time to settle the instant matter as Defendant reviews additional billing records from Plaintiff. Plaintiff consents to this adjournment. This is the first request to adjourn the briefing schedule. Defendant apologizes for not making this request sooner, which was delayed due to the illness of the undersigned.

The parties are hopeful that they can settle this matter without further burden on the Court's time, just as the parties have recently been able to settle the matters of *R.J. v. N.Y.C. Dep't of Educ.*, 23-cv-3043 (KPF)(GWG), *S.W.*, 23-cv-20 (PGG)(SDA), *W.S.*, 23-cv-4493 (ALC)(GS) and *T.H.*, 23-cv-3951 (JMF)(JLC). Thank you for considering this request.

Respectfully submitted,

/s/

Martha Nimmer, Esq.
Special Assistant Corporation Counsel

cc: Francesca Antorino, Esq. (via ECF)
Benjamin Kopp, Esq. (via ECF)

Application GRANTED. Plaintiff's moving papers are due 2/23/24. Defendant's opposition is due 3/25/24. Plaintiff's reply, if any, is due 4/8/24. SO ORDERED.

Dated: December 27, 2023